

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

Genevieve M. Zimmerman, being first duly sworn, deposes and declares as follows:

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesh & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. I submit this declaration in support of Plaintiffs' Response Opposing Defendants' Motion to Exclude Testimony of Yadin David, Ed.D., P.E., C.C.E. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.
3. Attached hereto as Exhibit 1 is a true and correct copy of Dr. Yadin David's expert report.
4. Attached hereto as Exhibit 2 is a true and correct copy of Dr. Yadin David's curriculum vitae.
5. Attached hereto as Exhibit 3 is a true and correct copy of portions of Dr. Yadin David's deposition, taken in Houston, Texas, on August 1, 2017.

6. Attached hereto as Exhibit 4 is a true and correct copy of the 510(k) Summary for the TableGard patient warming system, dated May 15, 2008, received by the FDA on May 18, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, MN, this 3rd day of October, 2017.

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman (MN#330292)
MESHBESHER & SPENCE, LTD.
1616 Park Avenue
Minneapolis, MN 55404
Phone: (612) 339-9121
Fax: (612) 339-9188
Email: gzimmerman@meshbesh.com

Plaintiffs Co-Lead Counsel